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EU Consultation on Feed Labeling

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Approved by:

Stan Cohen

U.S. Mission to the EU

Prepared by:

Tania De Belder

Report Highlights:

The European Commission published a consultation on feed labeling legislation. Interested parties are invited to fill in a questionnaire before January 16, 2006. The consultation is intended to gather input for a future proposal on feed labeling which would replace the current fragmented and at times inconsistent legislation on feed. The objectives of the future proposal are to ensure food and feed safety and to tighten labeling and traceability requirements for animal feed.

Includes PSD Changes: No
Includes Trade Matrix: No
Unscheduled Report
Brussels USEU [BE2]
[E3]

OPEN CONSULTATION

This consultation intends to introduce changes in the four existing Directives on labeling and authorization of certain feedingstuffs (Directives 96/25/EC, 79/373/EEC, 82/471/EEC and 93/74/EEC). This consultation is open and participation is possible by answering the questionnaire at the following website:

http://europa.eu.int/comm/food/consultations/questionnaire_stakeholders.pdf

SPECIFIC ISSUES

For every issue in this consultation, various policy options are considered.

- *option 1* is a 'retention of the *status quo*' in every case and ,

- *option 4* is considered a pro-active approach, because additional information on the label can be provided by the implementation of *Codes of Good Practice*.

The other possible options are described briefly, since they are very specific for every issue.

Main changes concerning labeling requirements

Labeling requirements for feed materials and compound feedingstuffs

The basic problem is that the labeling requirements for compound feedingstuffs and feed materials differ. A feed material is a product intended for use in oral animal feeding, either directly or after processing. A compound feedingstuff is considered a mixture of feed materials. A solution is to introduce the same basic labeling requirements for feed materials and compound feedingstuffs. A more detailed solution is to make not only the basic labeling requirements the same for feed materials and compound feedingstuffs, but also other labeling requirements, such as the declaration of analytical constituents.

Additives

The declaration of additives on the label of a compound feed or a feed material is compulsory only to certain categories of additives that may pose a higher risk, such as coccidiostats, vitamin E or copper. The question is whether a reference to all additives on the label should be made compulsory.

Feed materials for non-food-producing animals

On the label of compound feedingstuffs for pets, the specific name of each feed material may be replaced by the category to which the material belongs (i.e. "cereals" instead of wheat or maize). It is permitted to focus on one ingredient that is characteristic for the product. If the label indicates "with minimum 4 % of beef", no information on the other main ingredients is given. The problem in that case is that not all the information occurs on the label. The feed may contain a high quantity of chicken by-products as a main ingredient as well, for example. This problem can be solved by indicating the percentages of all feed materials on the label, either based on banding or by weight in descending order.

Derogations

Some of the derogations in Directive 96/25/EC and 79/373/EEC are very important in some of the Member States, but risk to have food and feed safety implications. The question is whether to withdraw some of the derogations or all of the derogations. The stakeholders are invited to clarify the economic impact of any of the derogations, if they want some of the derogations to be kept.

Non-exclusive list

The feed materials in the non-exclusive list of feed materials, in Annex B to Directive 96/25/EC, may be put on the market under the specified names and corresponding with the description given in the list. The question is whether to extend or complete the current non-exclusive list in order to increase the range of feed materials with harmonized names and characteristics.

Options concerning nutritional claims

Directive 93/74/EEC contains an exhaustive list of "dietetic feedingstuffs", which are intended to meet particular nutritional needs of animals. The issue is whether the current legislation is sufficient to prevent abuses with respect to claims appearing on the labels and advertising of feedingstuffs. A solution is the introduction of uniform criteria to protect the users from misleading claims and to stimulate fair competition, which could not be achieved to the same extent through codes of conduct.

Options concerning advertising and presentation

Only a few of the specific criteria to prevent misleading and comparative advertising are applicable to feedingstuffs. The presentation and advertising of feed might mislead users as to the actual properties of the feed. In order to create more specific and better adapted restrictions, the criteria against misleading labelling should be extended to advertising and presentation of feedingstuffs.

Options concerning authorization procedures

The authorization of certain type of feed materials requires a risk assessment before being placed on the market. Currently, such an authorization procedure exists for bioproteins and genetically modified food and feed. The question is whether other feed materials, apart from bioproteins and GMO's, should be subject to risk assessment and authorization before being placed on the market. Arguments for extending the approval process could be the use of new technologies, feed materials without a tradition of safe use in the European Community and the increased risk of a concentration of undesirable substances (e.g. novel feeds, decontaminated materials or by-products from pharmaceutical industry).

SUBSEQUENT POLICY DEVELOPMENT STAGES

The impact assessment of the Commission on the changes in the existing legislation will be published on the SANCO website at the following address:

http://europa.eu.int/comm/dgs/health_consumer/index_en.htm

The Commission intends to prepare a legislative proposal in 2007.

Visit our website: our website www.useu.be/agri/usda.html provides a broad range of useful information on EU import rules and food laws and allows easy access to USEU reports, trade information and other practical information. More information on petfood can be found at <http://www.useu.be/agri/foodsafety.html>. E-mail: AgUSEUBrussels@usda.gov